



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

October 9, 2020

By ECF and Email

The Honorable Denise L. Cote
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

Re: United States v. Joel Cabrera,
No. 20 Cr. 172 (DLC)
No. 20 Cr. 388 (DLC)

USDC SDNY
DOCUMENT
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DOC #:
DATE FILED: 10-9-2020

Dear Judge Cote:

The Government respectfully requests, with the consent of Joel Cabrera, the defendant, that the Court consolidate for trial the two above-referenced cases pursuant to Federal Rule of Criminal Procedure 13.

The parties request such consolidation without prejudice to either party making a future application to bifurcate Count One in information number 20 Cr. 172, charging the defendant with being a felon in possession of ammunition, from the counts set forth in indictment number 20 Cr. 388.

Respectfully submitted,

AUDREY STRAUSS
Acting United States Attorney

by: /s/ _____
Daniel H. Wolf / Alexander N. Li
Assistant United States Attorneys
(212) 637-2337 / -2265

cc: Robert Osuna, Esq. (counsel to Joel Cabrera)

Gravell

Denise Cote
Oct. 9, 2020